

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own
Motion into the Appropriate Pricing, based upon Total Element Long-Run
Incremental Costs, for Unbundled Network Elements and Combinations of
Unbundled Network Elements, and the Appropriate Avoided Cost Discount for D.T.E.
Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the 01-20
Commonwealth of Massachusetts

VERIZON MASSACHUSETTS

THIRD SET OF INFORMATION REQUESTS TO AT&T

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA")
requests that AT&T Communications of New England, Inc. ("AT&T") respond to the
following information requests addressed to it or its witnesses. In the event responses to
all or part of these requests will not be forthcoming in the time period established for this
proceeding by the Massachusetts Department of Telecommunications and Energy, kindly
notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental
responses if AT&T, or its witnesses receive or generate additional information within the
scope of these requests between the time of the original responses and the end of hearings
in this proceeding.

All responses should conform to the specifications as given in the Definitions and
Instructions, with respect to dates, documents, claims or privileges, etc.

If AT&T feels that any request is ambiguous, please notify Verizon MA so that the
request may be clarified prior to the preparation of a written response.

DEFINITION AND INSTRUCTIONS

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. In these Information Requests, "AT&T" means AT&T Communications of New England, Inc., and its respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

3. "Verizon" means Verizon New England, Inc. d/b/a Verizon Massachusetts.

4. "NRCM" means the Non-Recurring Cost Model presented by AT&T's witness, Richard Walsh, in this proceeding.

5. "Document" and "documentation" are used in the broadest sense to mean all writings and records of every type, including without limitation, written, printed, typed or visually reproduced material of any kind, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, photographic records, computer files, whether or not such files are presently in a hard copy form, other data compilation, or any other written recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge of information. "Document" and "documentation" shall also mean copies of documents, notwithstanding that the originals thereof are not in your possession, custody or control, and all attachments to any document.

6. If AT&T cannot answer a request in full, answer to the extent possible and state why AT&T cannot answer the request in full.

7. If AT&T refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

8. Please serve a copy of the responses to these requests on Verizon MA's attorney, Bruce P. Beausejour, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1. Please identify the version of the NRCM used to produce the cost estimates set forth in Exhibit RJW-3.
2. Please provide all input values to the NCRM used by Mr. Walsh to produce the costs listed in Exhibit RJW-3. Provide all documents, studies, source material etc. that support the use of these inputs.
3. Please provide all documents, time and motion studies, and source material concerning, referring, or relating to the development of the NRCM.
4. Please provide all documents, time and motion studies, and source material concerning, referring, relating to the development of the non-recurring cost estimates listed in Exhibit RJW-3, including, but not limited to, the batch output results.
5. Please provide any non-recurring cost studies performed by AT&T within the last 3-5 years that include times for work activities that are similar or identical to those work activities included in the NRCM.
6. Please provide the AT&T Task Oriented Costing ("TOC") studies produced in the California Public Utilities Commission proceeding, (the "OANAD") Docket Nos. R.93-04-003/I.93-04-002.
7. Provide a copy of all documents describing or in any way referring to the NRCM model's methodology, assumptions and operation, or addressing issues or problems which AT&T, its witnesses or consultants have identified with the model created for the purposes of developing or revising the model.
8. Please identify each member of the "panel of experts" that reached a consensus on the activities, probabilities and work times included in the NRCM as referenced on pages 26 and 27 of Mr. Walsh's testimony.
9. Please provide all documents concerning, referring, relating to or substantiating the "judgments" of and conclusions reached by the "panel of experts" regarding the activities, probabilities, and work time estimates included in the NRCM referenced on page 26-27 of Mr. Walsh's testimony.
10. Please identify all costing principles supporting each conclusion reached by the "panel of experts" described on pages 26-27 of Mr. Walsh's testimony.
11. Please provide all documents showing the development and support of wage rates referred on page 26 of Mr. Walsh's testimony.
12. Please produce all documents detailing or describing the educational and professional background of Mr. Walsh, including but not limited to, his curricula vitae.

13. Please provide the specific rules Mr. Walsh applies to an Incumbent Local Exchange Carrier's engineering guidelines to determine if they are appropriate for use in a forward looking cost study.

14. Please provide all documents concerning, referring, relating to or substantiating the 4.35% variable overhead expense factor set forth on page 26 of Mr. Walsh's testimony.

15. Please describe in detail the "panel of experts" level of experience in provisioning service orders for designed and non-designed services as it pertains to the managing of central offices, cable construction and repair, and installation and repair referenced on pages 26-27 of Mr. Walsh's testimony.

16. Please provide all documents and assumptions substantiating the assumption of the "panel of experts" that a 2% fallout rate is reasonable in the provisioning of unbundled network elements referenced on page 30 of Mr. Walsh's testimony.

17. Please describe in detail Mr. Walsh's background as it pertains to the provisioning of the migration element types referenced on page 27 of his testimony.

18. Please produce all documents detailing or describing the educational and professional background and experience of each member of the "panel of experts" referenced on pages 26-27 of Mr. Walsh's testimony, including but not limited to their curricula vitae.

19. Please identify all work activities that the "panel of experts" accounted for in the 60 seconds necessary to establish an original cross connect service order as contained in the NRCM.

20. Please identify all work activities the "panel of experts" accounted for in the 30 seconds necessary to disconnect the cross wire on an existing customer service as contained in the NRCM.

21. Please describe in detail the method of cost recovery for all Operational Support Systems (OSSs) as endorsed by AT&T to the FCC for use in the FCC's Universal Service Cost Model.

22. Please provide the number and percent of digital carrier spans (DS1 level) currently provisioned by AT&T on copper and fiber in Massachusetts.

23. Please provide the number and percent of local loops currently provisioned by AT&T on copper and fiber in Massachusetts.

24. Please provide AT&T's engineering criteria associated with the placement of distribution cable for customers served by AT&T in the state of Massachusetts, and the associated utilization of that cable at the time of placement.

25. Please identify the version of the adjunct model used to produce the cost estimates set forth in Exhibit RJW-4.

26. Please provide all documents, time and motion studies, and source material concerning, referring, or relating to the development of the adjunct model.

27. Please provide all input values to the adjunct model used by Mr. Walsh to produce the costs listed in Exhibit RJW-4. Provide all documents, studies, source material etc. that support the use of these inputs.

28. Please provide an electronic copy of the adjunct model used to produce the cost estimates set forth in Exhibit RJW-4. Provide a copy of all documents describing or in any way referring to the model's methodology, assumptions and operation, including but not limited to any minutes or notes taken or recorded at meetings where the model was in any way discussed.

29. Identify all differences between NRCM version 2.2 and the version of the model AT&T filed with the Department in Phase 4 of the *Consolidated Arbitrations* and explain why those changes were made in the current version of the NRCM.

Respectfully submitted,

Verizon Massachusetts

By its attorney,

Bruce P. Beausejour

185 Franklin Street, Room 1403

Boston, Massachusetts 02110-1585

(617) 743-2445

Dated: May 18, 2001